



586 Cynwood Dr. • Easton, MD 21601-3805 [talbothospice.org](http://talbothospice.org)  
24-hour Access Line 410-822-2724 • General Phone 410-822-6681 • Fax 410-822-5376

Mr. Paul Parker  
Director of the Commission's Center for Health Care Facilities  
Planning and Development  
Maryland Health Care Commission  
4160 Patterson Avenue  
Baltimore, Maryland 21215

RE: Certificate of Need (CON) for Hospices

January 10, 2018

Dear Mr. Parker:

In response to letter received from the Maryland Health Care Commission, I wish to express my views regarding the continuation of the general hospice CON regulation.

**I am in favor of maintaining the Hospice CON regulation and support revisions or refinement in the CON process.**

I do not believe the residents of Maryland would benefit from removing the CON regulation. The current process may be a bit burdensome for the hospice seeking licensure, and yes, some refinement to the CON process may be warranted.

I believe the CON process is a positive structure in the state. The MHHC has done a good job at looking at demographics in a region, mortality rates, and other vital statistics and has a broad overview of the health and welfare of the state. The CON process prevents an influx of agencies/entities converging in an area for increased competition.

- Removing the CON regulation will negatively impact smaller sized hospices or hospices that provide services in a less densely populated county or only in one county.
- It is my belief it will cause an influx of many hospices to flood an area causing greater difficulty for any one hospice to stay viable.
- For small hospices and in a small region (i.e. one county) additional competition and deregulation of the CON process would be a detriment to small hospices, especially like hospices on the Eastern Shore.

# Talbot Hospice

586 Cynwood Dr. • Easton, MD 21601-3805 [talbothospice.org](http://talbothospice.org)  
24-hour Access Line 410-822-2724 • General Phone 410-822-6681 • Fax 410-822-5376


- Talbot Hospice has been fully licensed as a general hospice for just three (3) years and our organization continues to work on building our census and program. The county has 39,000 residents, which will not support another hospice in this county. I am very concerned that Talbot Hospice would cease to exist with additional competition. We focus on exceeding the state regulations, Medicare Conditions of Participation and take pride that the quality of care we provide is exemplary.
- De-regulation will allow any entity to advertise (falsely) they provide hospice services without much oversight. There are a few home health agencies and Skilled Nursing Facilities that unfortunately advertise hospice services when in fact are not licensed as such.

I support a restructuring and revisions to the CON process if it aids reducing workload and paperwork for both the MHHC and the hospices applying for licensure. Review of any hospice's licensure survey and quality metrics may be an area for which to include when applying for licensure. Whatever the state determines broadly, the MHHC must take in to account the small hospices in rural areas and at a minimum consider the continuation of a rural distinction.

Palliative Care programs are currently not under the CON process and as a small hospice working to establish a new Palliative Care Program, we are experiencing increased competition from other hospices not licensed in Talbot County and from other entities. This makes the development of and expansion of our services more difficult. As with Palliative Care, deregulation of the hospice CON will dilute hospice services throughout the state of Maryland.

I support efforts to open up eligibility requirements for currently licensed hospices. This allows hospices to serve patients further upstream, reducing costs by Medicare and the state.

Sincerely,



Vivian Dodge, MBA, BSN, RN  
Executive Director